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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11 (Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY DEFAULT
GRANTING DEBTORS' MOTION PURSUANT TO
11 U.S.C §§ 363(b) AND 105(a) AND FED. R.
BANKR. P. 9019 AND 6004 FOR ENTRY OF AN
ORDER APPROVING SETTLEMENT
AGREEMENT RESOLVING LOCATE AND MARK
OII**

Date: April 29, 2020
Time: 10:00 a.m. (Pacific Time)
Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: April 22, 2020, 4:00 pm (PT)

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of an Order Approving Settlement Agreement Resolving Locate and Mark OII* filed by the Debtors on April 8, 2020 [Dkt. No. 6710] (the “**Motion**”).

RELIEF REQUESTED IN THE MOTION

The Motion seeks entry of an order approving the Settlement Agreement, dated October 3, 2019, by and among the Utility, the Safety and Enforcement Division of the California Public Utilities Commission, and the Coalition of California Utility Employees in the L&M OII (as defined in the Motion).

A proposed order (the “**Proposed Order**”) was attached as **Exhibit A** to the Motion. The order being submitted is different from the Proposed Order attached to the Motion in that the reference to a hearing being held has been deleted.

NOTICE AND SERVICE

A *Notice of Hearing on Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 9019 and 6004 for Entry of an Order Approving Settlement Agreement Resolving Locate and Mark OII* [Dkt. No. 6712] (the “**Notice of Hearing**”) was filed on April 8, 2020. The Motion, the supporting declaration of Alejandro Vallejo, and the Notice of Hearing were served as described in the Certificate of Service of Andrew G. Vignali filed on April 13, 2020 [Dkt. No. 6744]. The deadline to file responses or oppositions to the Motion has passed, and no responses or oppositions have been filed with the Court or received by counsel for the Debtors.

DECLARATION OF NO RESPONSE RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: April 24, 2020

**WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP**

/s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Debtors in Possession